



## **Transmission Business Line (TBL)**

### **BPAT'S Response to Comments from PRM on BPAT's Business Practice Revision 1 Draft Posted April 09, 2003**

#### **ENERGY IMBALANCE SERVICE**

Posted: May 5, 2003

PRM provides the following comments on the proposed revision to the Energy Imbalance business practice as posted on the TBL business practices website at <http://www.transmission.bpa.gov/oasis/bpat/BusPractices/forum/messageview.cfm?catid=9&threadid=61>. BPAT responses are provided after each point.

#### **Customer Comment**

Hi Mary Ann

This is a follow-up to our verbal communication yesterday. PRM recommends to do away with the current double entry of the EISS to TBL and PBL. Under the current practice, customer is expected to enter EISS and forecasted load in the CWI at 30 minutes before the hour for making changes to the next scheduling hour. The rationale for this arrangement is for TBL to check that the customer is reserving no more than 6% of its forecasted load. But TBL does not check whether the customer submits its forecasted load correctly. There is nothing to prevent the customer from "exaggerating" its forecasted load. So what is the point of the 6% check? The only way to enforce the 6% check is for TBL to compute the customer's forecasted load, which is really the algebraic sum of all the transmission schedules flowing into the customer's system minus all the transmission schedules flowing out of the customer's system.

#### ***BPAT Response***

*BPAT agrees with your suggestion and may incorporate your recommendation in future system updates to the Customer Web Interface (CWI).*

#### **Customer Comment**

The only problem with this arrangement is that TBL will not be able to calculate the customer's forecasted load until after the close of the scheduling window. Now we have a paradox. TBL will not know what limit to set when the customer can submit EISS reserve, and when the limit becomes available to TBL (i.e. the customer's forecasted load is computed), the customer may no longer submit EISS reserve. So, the only logical solution left is do away with the submittal of EISS. This is exactly what TBL has adopted for operating reserve self-supply. TBL does not require the operating reserve self-supply customer to submit the reserve number to them. The customer only has to schedule the self-supply reserve with PBL. TBL calculates the customer's reserve requirement after the closing of the scheduling window and communicate that reserve requirement to the customer and PBL at about 10 to 15 minutes to the hour. If the customer scheduled equal or more operating reserve with PBL than the reserve requirement computed by TBL, the customer is deemed to be in compliance. Otherwise, a strike is inflicted upon the

customer. A parallel process can be used here for EISS. TBL calculates the customer's 6% limit on self-supply after the closing of the scheduling window and communicate that reserve limit to the customer and PBL prior to the top of the hour. The customer only needs to schedule EISS with PBL within the normal scheduling window. If the customer scheduled equal or less than the reserve limit computed by TBL, the customer is deemed to be in compliance. Otherwise, a strike or infraction may apply.

Please note that this concept and process is not foreign to TBL. You are already doing it for one type of ancillary service with success. Why not adopt an parallel process among the various types of ancillary services when there are enough similarities among them? This will make your life and mine simpler.

Thank you for your audience!

Jonah  
PRM

***BPAT Response***

*Although BPAT did not request customer comments on this section, it may consider your recommendation in future revisions to this business practice. However, BPAT cannot assign a fixed 6% for EISS to a customer as you suggest. As you stated, currently, Operating Reserves is a fixed amount based upon BPAT's operating reserve requirements for the next hour but the Energy Imbalance self-supply amount can vary from 0 to 6% at the customer's discretion.*

*Thank your for your comments. BPAT looks forward to working with you to continue improving this service.*